

South Coast Air Quality Management District

Statement of Basis Title V Facility Permit Renewal

Issuance Date: January 4, 2012

Facility Name:	LA County Sanitation Districts (LACSD), Calabasas
Facility ID:	42514
SIC Code:	4953
Equipment Location:	5200-5300 Lost Hills Road (Calabasas LF) Agoura, CA 91301
Application #(s):	516550
Application Submittal Date(s):	11/23/2010
Permit Renewal:	Draft
Revision No. 2 Date:	May 11, 2010
Permit Section(s) Affected:	Various
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1. Introduction and Scope of Permit

Title V is a national operating permit program for air pollution sources. Facilities subject to Title V must obtain a Title V permit and comply with specific Title V procedures to modify the permit. This permit replaces the facility's other existing permits. Title V does not necessarily include any new requirements for reducing emissions. It does, however, include new permitting, noticing, recordkeeping, and reporting requirements.

The AQMD implements Title V through Regulation XXX – Title V Permits, adopted by the AQMD Governing Board in order to comply with EPA's requirement that local air permitting authorities develop a Title V program. Regulation XXX was developed with the participation of the public and affected facilities through a series of public workshops, working group meetings, public hearings and other meetings.

The Title V major source threshold for a particular pollutant depends on the attainment status of the pollutant. NO₂, SO₂, CO and lead are in attainment with federal standards. The status for PM₁₀ is serious nonattainment. The status for ozone is currently extreme nonattainment.

A Title V renewal permit is proposed to be issued to cover the operations of an active municipal solid waste landfill. This facility is subject to Title V requirements because it is a major source.

2. Facility Description

This is an active landfill facility. Main operations include landfill gas (LFG) collection system, landfill condensate/leachate collection/ treatment system, LFG combustion enclosed flare station and LFG combustion turbines to produce about 13.8 gross MW power. The facility is located at 5200-5300 Lost Hills Road, Agoura, CA.

3. Construction and Permitting History

An initial Title V permit was issued on May 23, 2006, and was due to expire on May 22, 2011. Most recent Title V revision was issued on May 11, 2010, to include a permit to construct and operate air stripper system No. 1 (A/N 501732), in Section D.

4. Regulatory Applicability Determinations

Applicable legal requirements for which this facility is required are identified in the Title V permit (for example, Section D, E, H, and K, of the proposed Title V renewal permit). Applicability determinations (i.e., determinations made by the District with respect to what legal requirements apply to a specific piece of equipment, process, or operation) can be found in the Engineering Evaluations. This facility is subject to NESHAP requirements applicable to operators of municipal solid waste (MSW) landfills, 40 CFR Part 63, Subpart AAAA. The permit terms and conditions may be found in Sections D and J of the Title V permit.

5. Monitoring and Operational Requirements

Applicable monitoring and operational requirements for which the facility is required to comply are identified in the Title V permit (for example, Sections D, F, and J and Appendix B of the proposed Title V permit). Discussion of any applicable monitoring and operational requirements can be found in the Engineering Evaluations. Compliance Assurance Monitoring (CAM) requirements of 40 CFR Part 64 apply to the permitted emission control source at this facility. CAM plan for Reactive Organic Gases (ROG) emission control using APC (three gas turbines & flares) is addressed under A/Ns 458588 through 458590 and Permit F77394, A/N 440826, respectively.

6. Permit Features

Permit Shield

A permit shield is an optional part of a Title V permit that gives the facility an explicit protection from requirements that do not apply to the facility. A permit shield is a provision in a permit that states that compliance with the conditions of the permit shall be deemed compliance with all identified regulatory requirements. To incorporate a permit shield into the Title V permit involves submission of applications for change of conditions for each equipment affected by the permit shield. Permit shields are addressed in Rule 3004 (c). This facility has not applied for a permit shield.

Streamlining Requirements

Some emission units may be subject to multiple requirements which are closely related or redundant. The conditions may be streamlined to simplify the permit conditions and compliance. Emission limits, work practice standards, and monitoring, recordkeeping, and reporting requirements may be streamlined. Compliance with a streamlined condition will be deemed compliance with the underlying requirements whether or not the emission unit is actually in compliance with the specific underlying requirement. This facility has not applied for any streamlined conditions.

7. Summary of Emissions and Health Risks

Criteria Pollutant Emissions (tons/year) Annual Reported Emissions for Reporting Period 2010

<i>Pollutant</i>	<i>Emissions (tons/year)</i>
CO	2.095
NO _x	18.087
ROG	2.674
SO _x	31.406
TSP	9.318

Toxic Air Contaminants Emissions (TAC) Annual Reported Emissions for Reporting Period 2010

<i>TACs Reported</i>	<i>Emissions (lbs/yr)</i>
Benzene	40.447
Freon-12	1.40
Methyl chloroform	1.40
Methylene chloride	4.140
Perchloroethylene	11.258
Trichloroethylene	5.891
Freon -11	1.262
Vinyl chloride	8.435

Health Risk from Toxic Air Contaminants

The facility health risk, per Air Toxics Information and Assessment Act (AB2588), was approved in 2010 with cancer risk = 6.78 in a million, Acute Hazard Index (HIA) = 0.02 and Chronic Hazard Index (CHA) = <0.01.

8. Compliance History

The facility has been subject to both self-reporting requirements and AQMD inspections. Facility inspection report for July 19, 2011 indicated that permitted equipment were operating satisfactorily and in compliance with permit conditions and applicable rules. As per District records there was one citizen complaint received (7/13/10) and there were no NC or NOV issued for the period 01/01/2010 through 12/29/2011.

9. Compliance Certification

By virtue of the Title V renewal permit application and issuance of the renewed permit in coming months, the reporting frequency for compliance certification for the facility shall be annual.

10. Comments

None.